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Pharmaceuticals

Anthony J. Maddaluna
General Manager

December 12, 1997

Ms. Elizabeth Muñoz, Director
Puerto Rico Environmental Quality Board
Air Quality Section
P. O. Box 11488
Santurce ,PR 00910

Dear Ms. Muñoz:

Re: PPI Utility Expansion Construction Permit revision
PFE-09-0696- 0669-II-C

On December 2,1997 Pfizer Pharmaceuticals, Inc. (PPI) met with EQB staff and discussed the status of the above referenced project. In this meeting several changes of the construction permit that are necessary, due to problems found during the start-up were discussed. Your recommendations after a detailed description of the situation were :

⇒ submit a request to revise the construction permit
⇒ submit a request to revise the existing plant operating permit
⇒ revise the Title V application that was submitted on November 1996.

This letter addresses the first item above - *revision of the existing construction permit* with the changes discussed at our meeting. Attached you will find the revised construction permit application with the supporting information. As discussed at the December 2 meeting, your support to obtain this permit revision quickly so PPI can proceed with startup of the facility planned for December 18, 1997 is required.

Background Information

The project includes installation of five 1600 kW diesel engine electric generators, a 30,000 lb./hr. heat recovery steam generator (HRSG), and a 30,000 lb./hr steam package boiler. The diesel engines are equipped with a two stage Selective Catalytic Reduction (SCR) system to minimize NO_x emissions. Both the HRSG and the package boiler are installed with low NO_x burners. A continuous emission monitor (CEM) will be installed to continuously verify low NO_x emissions from the engines and HRSG. The facility burns only low sulfur fuel (<0.2% S) to minimize emissions of SO_2. A tall stack (~190 feet) is installed to minimize ground level emission impacts. Also, as part of the project, two existing steam boilers will be retired.

PPI expanded the existing utility plant for a number of reasons including: to provide emergency power capabilities; to support current and future plant steam needs (including steam to undertake important waste minimization initiatives); and to improve efficiency of energy use at the facility.

The projected emissions from the project are well below USEPA Prevention of Significant Deterioration (PSD) and EQB's Location Approval Significant Levels. As indicated in EPA's PSD non-applicability determination for this project, PSD does not apply.

This project will result in significant environmental benefits. On a site wide basis, it will result in substantial decreases in actual current SO_2 emissions (~25 tons/yr.) and newly permitted NO_x emissions will be less than currently permitted. Further, on an island wide basis, the overall environmental benefits will be substantial since on-site production of electricity with a cogeneration system employing state-of-the-art emission controls will produce significantly less pollutants per equivalent unit of energy than does a PREPA facility.

Proposed construction permit revision

The proposed condition is in Spanish and is the language expected in the permit.

1. Condition No. 5 / 6

   The following statement must be added at the end of this condition:

   "Dentro de 180 días de esta fecha en adelante, Pfizer deberá realizar un muestreo de chimenea según se especifica en la condición número 6 de este permiso. Pfizer deberá obtener primero un permiso de operación para el inicio de sus operaciones o sea el inicio de la producción de sus productos usando la nueva planta de utilidades. Esto no incluye pruebas de funcionamiento que necesita hacer la compañía durante la fase de construcción. En tal caso, este permiso de construcción cubre estas actividades."

   Reason:
   The purpose of this statement is to clarify that it is necessary to obtain an operating permit before conducting stack testing of the unit and to clarify that trouble shooting testing is covered by the construction permit conditions.

2. Condition No. 7

   Change the start up condition limit from ***30 minutes*** to ***60 minutes***.

   Reason:
   The original permit condition was based on a design estimate that it would take thirty (30) minutes or less to heat the SCR units to a point where ammonia injection can begin, which is when effective NOx removal starts. In the commissioning process, it was experienced that the design estimates were incorrect - it requires slightly more time to heat up the SCR unit than estimated. This modification will not affect PPI's ability to meet the construction permit cap of fifty-six (56) tons of NOX.

3. Condition No. 9

   The following statement should be added at the end of this condition:

   "Durante los primeros quince (15) minutos de iniciada la operación en la cual el HRSG no ha llegado a la temperatura necesaria por su operación, se permitirá un "bypass" a el HSRG y el sistema de CEM. En substitución la compañía Pfizer usará el factor de emisión sin control de 705.4 lbs de NOx/1000 gal o el factor que

se demuestre en las pruebas de chimenea. Las emisiones calculadas usando el factor de emisión sin control deberá añadirse a las lecturas del CEM para determinar emisiones totales del sistema de cogeneración."

Reason:
During commissioning, PPI found that exhaust from the engines after a cold startup is not warm enough to introduce the flue gases directly into the Heat Recovery Boiler (HRSG). Introducing an engine exhaust gas with a temperature less than a critical temperature (350 F) causes the HRSG unit to shutdown for safety reasons. To avoid HRSG shutdowns, it is necessary to bypass the engine exhaust around the HRSG and CEM for fifteen (15) minutes or less until they reach the critical exhaust temperature. PPI is evaluating several technical options to decrease the bypass period and provide a means of monitoring the bypass emission with the CEM. In the interim, engine NOX emission during any bypass period will be determined through conservative emission factors, i.e., assuming no SCR reduction. These emissions will be added to the CEM readings to fully account for all the NOX emissions from the new utility plant.

PPI would like to emphasize that the above requested permit changes will not result in emissions over the previously approved amounts, and therefore in no way impact or trigger PSD thresholds or review requirements. Also, these changes in no way are regulated or impacted by NSPS requirements.

We would appreciate your prompt review of the application and incorporation of the above suggested permit conditions, as agreed in the December 2, 1997 meeting.

Very truly yours,

A. J. Maddaluna

c. Carlos López - PPI
Ramón Marrero - PPI
John Keith - Pfizer Inc

Attachments
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